

Federal Communications Commission
CenturyLink
Dan Kleiber
**SECTION 214 APPLICATION TO DISCONTINUE DOMESTIC NON-DOMINANT CARRIER
TELECOMMUNICATIONS SERVICES WC Docket No. 16-383, Comp. Pol. File No. 1362**
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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

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CenturyLink)	
SECTION 214 APPLICATION TO)	WC Docket No(s). 16-383
DISCONTINUE DOMESTIC NON-DOMINANT)	Comp. Pol. File No. 1362
CARRIER TELECOMMUNICATIONS SERVICES)	
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To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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Dear Sir or Madam,

I am writing to urge you to deny CenturyLink's request to abandon its landline phone system. Please promulgate Notices of Proposed Rule Making (NPRM) with the aim of protecting the civil rights of people with radiofrequency sickness and tightening engineering standards for electronic devices to protect human health from the "dirty" electricity they produce.

Please deny the CenturyLink's request to abandon their landline phone system.

The wireless technology that CenturyLink proposes to replace many landline phones with has been found by the U.S. NTP to break DNA and cause cancer. A replicated European study has found that radiation from wireless technology acts as a cancer promotor (<http://ehtrust.org/science/facts-national-toxicology-program-cellphone-rat-cancer-study/>). Radiofrequency radiation, emitted by wireless technology, is classified as a class 2B possible carcinogen by the World Health Organization and only complies with completely outdated thermally-based "safety" limits. It should not be forced on ANY telephone customers. Use should be discouraged, not encouraged, because additional use means an increase in unavoidable radiation emissions from antenna installations, resulting in increased health risks for surrounding citizens and increased environmental damage (<http://www.youtube.com/watch?v=wARxnaxrRKk>). Some experts from the IARC panel think the classification should be changed to probable carcinogen or even carcinogen.

Transmitted radiofrequency radiation (rf) from any source negatively affects my health and that of my family. I am a type I, insulin-dependent diabetic. As such, I test my blood sugar many times per day. I have noticed that rf causes my blood sugar to increase in dangerous ways. On a week-long vacation to visit family, a wireless router caused my blood sugar to become very high. No matter how much insulin I used, I could not get my blood sugar to return to normal, acceptable levels. We ended up cutting our vacation short in order to bring my blood sugar back to normal. Later, we figured out what had happened. The owner of the router (a Microsoft Broadband Networking Wireless Base Station MN-700) was kind enough to turn it off during our next visit and my blood sugar was fine, until the morning we were leaving when it went up. When I checked, the router had recently been turned on.

One afternoon, a neighbor rode with me in my combine while I was harvesting corn. He had his cellular telephone turned on in his pocket. Shortly after he joined me, my blood sugar began to increase. I took some insulin to try to bring it back down, but to no avail. So I tried again. And again. Still without success. Later that afternoon, my neighbor left, taking his cellular telephone with him. My blood sugar immediately dropped to dangerously low levels once I was no longer exposed to the rf from the cellular telephone. Again, I didn't figure out what had happened until I had time to think later. This was one of the first times I was exposed to a cellphone in close proximity for several hours in a row. Now, in similar situations I ask that the phone be turned off.

My experiences with the router and cellphone show how rf affects me. In both situations, I was able to address the issue by asking that the devices be turned off. However, I do not have that option if I am forced to use a wireless device to communicate.

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I recently had a new and very scary reaction. While at a federal office for an essential appointment, I was forced into close proximity to two functional smart phones and a WiFiiing computer. I went into the office feeling fine with a normal blood sugar and came out with a very high blood sugar, a very elevated body temperature of 101 degrees Farenheit, and feeling awful. It took two days for my blood sugar and body temperature to return to normal and about a week to feel well. Radiofrequency radiation has been shown to cause calcium ion efflux (<http://www.electricalpollution.com/documents/Pallmicrow-vgccnoheat.pdf>). Inappropriate calcium efflux is known to cause a condition called malignant hyperthermia which can be fatal and is usually caused by certain anesthetics. Fortunately for me, the reaction stopped accelerating when I returned to our shielded house and then crawled into our shielded bed. It could easily be a fatal reaction for someone who did not realize what was happening.

The rapidly increasing rf radiation levels is impacting our ability to earn a living. I used to vend at farmers markets in Madison, Wisconsin and I am no longer able to do so due to the rising ambient rf radiation levels causing serious neurological symptoms suggestive of incipient ALS. The symptoms disappeared at the end of market season when I was able to spend time at my shielded home in much lower ambient rf radiation levels. (The levels outside our home are hundreds to thousands of times lower than ambient Madison levels. Even so, I can tell the improvement in my health when I am inside my shielded home where the levels are a third to a tenth the ambient outside levels and peaks are reduced by over half.) ALS is a progressive fatal neurological disorder whose incidence is increasing (https://wwwn.cdc.gov/als/Download/Neuro1%20Clin_ALS_Risk_Factors_2015.pdf). ALS is being linked to factors including oxidative damage (positively linked to smoking which causes oxidative damage), EMF exposure, and military service which would entail high levels of rf radiation exposure. Radiofrequency radiation has been shown to cause oxidative damage (<http://www.ncbi.nlm.nih.gov/pubmed/26151230>). If my experience is any indicator, the FCC is directly responsible for those deaths by promoting a dangerous technology in complete disregard of the science and the scientists who are calling for biologically-based population-protective RFR safety limits. This willful disregard of the consequences is a violation of our human rights and the Nuremberg Code of Ethics, please read "Wireless Technology Violates Human Rights," attached and at <http://www.electricalpollution.com/documents/WirelessViolatesHumanRights2016.pdf>

Other sources of rf also cause my blood sugar to increase. Dimmer switches, compact fluorescent lights, and variable speed motors all generate rf. Recently, the rise of wireless technology has greatly increased the incidence of rf. WiFi and cellphones make it difficult for me to conduct business or to travel. Forcing me to use a cellphone or electrically polluting technology to communicate could easily cause serious potentially life-threatening functional impairment for me and violate my rights under the ADA.

Copper line service carries its own power. Neither cell antennas nor cellphones necessarily do. What of reliability during disasters? This is especially important since smart meters have increased the vulnerability of the electrical grid (<http://www.gettingsmarteraboutthesmartgrid.org/>, <http://electromagnetichealth.org/wp-content/uploads/2014/02/Smart-Grid-Report-3-15-13.pdf>). Major outages have increased in the last few years. Furthermore, cellphones do not perform as well in many emergency situations, making prompt emergency response difficult, potentially costing lives.

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No one should be forced to switch from the tried and true safety of landlines to a potentially hazardous technology compliant only with outdated safety limits. In a recent letter, the United States Department of the Interior states that “the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today” (http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf). Any projects moving telephone service from landlines to wireless technology should be placed on hold until the FCC Docket (ET docket 13-84) looking at the outdated FCC rf limits reaches completion.

There are numerous studies showing that radiation from wireless technology seriously harms a variety of animal species and also plants, impairing reproduction, growth, and navigation.^{12, 13, 14} A NEPA evaluation and EIS are necessitated by the presence of three options which have the potential to have radically different impacts [Burkholder v. Peters, 58 F. App’x 94, 96 (6th Cir. 2003) (quoting 42 U.S.C. § 4332(2)(C)).] The EIS should include a review of the impact of all options on the environment, as well as on human health and safety. "The Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees" commissioned on 30th August, 2010 by the Ministry of Environment and Forest, Government of India (incorporated by reference herein in its entirety http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf) and "Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review," (incorporated by reference herein in its entirety http://www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf), Adverse Influence of Radio Frequency Background on Trembling Aspen Seedlings: Preliminary Observations (incorporated by reference herein in its entirety <https://www.hindawi.com/journals/ijfr/2010/836278/>), Tree damage in the vicinity of mobile phone base stations (incorporated by reference herein in its entirety <http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/06/Tree-damages-in-the-vicinity-of-mobile-phone-base-stations.pdf>), Radiofrequency radiation injures trees around mobile phone base stations (incorporated by reference herein in its entirety https://www.researchgate.net/publication/306435017_Radiofrequency_radiation_injures_trees_around_mobile_phone_base_stations), The trees make it easy to recognize the effects of RF-EMF. Examples of tree damage (incorporated by reference herein in its entirety <http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/09/Trees-in-Bamberg-and-Hallstadt-Documentation-2006-2016.pdf>) and the letter from the Department of Interior (incorporated by reference herein in its entirety http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf) provide enough compelling evidence of potential environmental harm at existing rf limits to necessitate an EIS evaluating the harm done by promoting additional wireless use and installation versus continuing in the status quo versus requiring repair of existing landline telephone infrastructure and pricing of wireless service to discourage frivolous use of wireless technology.

Abandoning copper landline phones will leave many people with radiofrequency sickness, electromagnetic hypersensitivity, etc. cut off from the world. Therefore, abandoning landlines is not in compliance with the ADA (Americans with Disabilities Act), particularly the 2008 ADA Amendments, which base their disability determination on interference with bodily functions (<http://www.govtrack.us/congress/bills/110/s3406/text>). There are many, many studies which corroborate my experience and show that rf radiation interferes with bodily processes, often seriously (www.biointitiative.org).

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Courts have interpreted the ADA and the 2008 ADA Amendments broadly to ensure accessibility throughout society and require broad inclusivity. (<http://www.justice.gov/osg/briefs/2003/3mer/2mer/2002-1667.mer.aa.html>, <http://disabilitylaw.blogspot.com/2012/06/d-mass-allows-ada-title-iii-challenge.html>) Thus, telecom companies cannot abandon landlines until they have a technology that provides an equal or better level of access to people with symptoms of rf sickness - estimated at 3-30% of the population and ranging from severely impaired to less severely impaired. People with rf sickness or functional impairments induced by rf exposure cannot safely use wireless technology or technology which exposes them to rf on wiring.

No new source of radiation exposure should be allowed without examining the ADA compliance. Many people are now excluded from public buildings, public places, parks, highways, and limited in almost all aspects of normal daily living. Continued rollout of additional sources of rf radiation puts the FCC in direct violation of the ADA. “Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects.”(<http://www.bioinitiative.org/conclusions/>)

The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. (H.R. Report No. 104-204, p. 94) FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. The Environmental Protection Agency (EPA) does. Therefore, the FCC should advocate for Congress to direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits

For safety reasons, the FCC must deny CenturyLink’s request to abandon landlines and should instead be opening supplemental NPRMs. One NPRM should develop rules to protect the civil rights of people with rf sickness and people who experience functional impairment with exposure to rf. A second NPRM should develop engineering standards that protect human health from rf on wiring from which it both radiates and capacitively couples to people in the vicinity.

Sincerely,

Dan Kleiber